

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

JAMES GHAI SAR, et al.,	)	
	)	
Plaintiffs,	)	
	)	
vs.	)	Civil Action No. 1:18-cv-954
	)	(TSE/MSN)
UNITED STATES OF AMERICA, et al.,	)	
	)	
Defendants.	)	
_____	)	

**THE UNITED STATES' MOTION TO DISMISS  
PLAINTIFFS' COMPLAINT**

Pursuant to Federal Rule of Civil Procedure 12(b)(1), Defendant, the United States of America, through undersigned counsel, hereby respectfully moves for dismissal of Plaintiffs' complaint in its entirety for lack of subject matter jurisdiction. The grounds for this motion are fully explained in the memorandum of law filed with the motion.

Respectfully submitted,

G. ZACHARY TERWILLIGER  
UNITED STATES ATTORNEY

By: \_\_\_\_\_/s/\_\_\_\_\_  
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ATTORNEYS FOR THE UNITED STATES

DATE: October 2, 2018

**CERTIFICATE OF SERVICE**

I hereby certify that on this date, I filed the foregoing via the CM/ECF system, which will send a Notification of Electronic Filing to the following:

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